



U.S. Department of Justice

Michael J. Sullivan
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District of Massachusetts

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June 16, 2005

Melvin Norris, Esq.
260 Boston Post Road, Suite 9
Wayland, MA 01778

Alan J. Black, Esq.
1383 Main Street
Springfield, MA 01103

Re: United States v. Bernabel, et al, Crim. No. 4:05-cr-40025-FDS

Dear Attorneys Norris and Black:

Pursuant to Rules 116.6(A) of the Local Rules of the United States District Court for the District of Massachusetts, the government declines to make the following disclosure as otherwise required under Local Rule 116.1(A)(1):

The government declines to identify the cooperating witnesses referenced in its automatic discovery letter dated June 16, 2005, by name at this time. Although the government anticipates that it will call these individuals as witnesses at trial, the government declines to reveal their identities at this time since such disclosure may jeopardize the safety and welfare of the witnesses. The government notes, however, that it has disclosed all of the information required to be disclosed about these witnesses under Local Rule 116.2(B)(1) (including the promises, rewards and inducements that these witnesses have received from the government and the fact that these witnesses have criminal records) in its automatic discovery letter.

Very truly yours,
MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Lisa M. Asiaf
LISA M. ASIAF
Assistant U.S. Attorney
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cc: Clerk's Office, U.S. District Court